

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

JHONNY EVANGELISTA CHEME TORRES

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§

Case Number 4:19CR208(1)
Judge Mazzant

FILED

JAN 26 2023

FACTUAL BASIS

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

The Defendant, Jhonny Evangelista Cheme Torres, with the full approval and concurrence of his attorney, Juan D. Berrio, hereby stipulates and agrees that at all times relevant to the Indictment the following facts were true and the admissions herein may be used by the Court in support of Defendant's guilty plea to Count One of the Indictment alleging a violation of 21 U.S.C. § 963 (conspiracy to manufacture and distribute cocaine, intending, knowing, and having reasonable cause to believe the cocaine would be unlawfully imported into the United States). The Defendant knowingly and voluntarily affirms his guilt and agrees that had this matter proceeded to trial, the Government, through the testimony of witnesses and other admissible evidence, would have proven every essential element of the offense alleged in Count One of the Indictment beyond a reasonable doubt, specifically including the following facts that the Defendant acknowledges are true.

1. Jhonny Evangelista Cheme Torres (hereinafter "Defendant") is the same person charged in the Indictment and is knowingly and voluntarily entering a guilty plea to Count One of the Indictment.

2. The events described in the Indictment occurred within the extraterritorial jurisdiction of the United States, and Defendant knowingly and voluntarily consents to venue in the Eastern District of Texas.

3. Beginning in or about January 2015 and continuing thereafter through in or about August 2019, Defendant knowingly and intentionally conspired, combined, and agreed with others (hereinafter the “Co-Conspirators”) to manufacture and distribute cocaine, intending, knowing, and having reasonable cause to believe that the cocaine would be unlawfully imported into the United States.

4. Defendant knew the unlawful purpose of that agreement.

5. Defendant joined in that agreement with the intent to further its unlawful purpose.

6. The overall scope of the conspiracy involved more than 450 kilograms of cocaine.

7. Defendant knew the scope of the conspiracy involved more than 450 kilograms of cocaine during his membership in the conspiracy, which quantity of cocaine was both reasonably foreseeable to Defendant and part of activity jointly undertaken with the Co-Conspirators.

8. Defendant’s primary role in the conspiracy included operating a maritime drug distribution network in Colombia together with his brother, Alexis Cheme Torres, by which they transported several dozen large cocaine shipments on board go-fast vessels from the Colombian coast to neighboring countries in Latin America for onward distribution to the United States. Each shipment typically carried between 500 and 1,000 kilograms of cocaine. Defendant and his brother supervised all aspects of their maritime drug transport enterprise and paid relatives, friends, and other drug trafficking associates to assist in the coordination, preparation, equipping, loading, fueling, and operation of the cocaine-laden go-fast vessels, including the following Co-Conspirators, among others: Henry Leandro Cheme Moreano, Cristian Cheme Moriano, Johan Manuel Narvaez Waitoto, Ariel Salas Paredes, and Hugo Hernando Meza Pineda.

(signature page follows)

DEFENDANT'S SIGNATURE AND ACKNOWLEDGMENT

I have read this Factual Basis and the Indictment, and/or had them read and explained to me in Spanish and discussed them in detail with my attorney, Juan D. Berrio. I fully understand the content of these documents, agree without reservation that this Factual Basis accurately describes the events and my acts, and sign this document knowingly and voluntarily.

Dated: 11/3/2022

Jhonny Evangelista Cheme Torres
Jhonny Evangelista Cheme Torres
Defendant

DEFENSE COUNSEL'S SIGNATURE AND ACKNOWLEDGMENT

I am counsel for Jhonny Evangelista Cheme Torres. I have read this Factual Basis and the Indictment, thoroughly reviewed them with Defendant, and ensured their provisions were translated into Spanish for Defendant's benefit. Based upon my discussions with Defendant, I am satisfied that Defendant understands both documents and is knowingly and voluntarily pleading guilty and agreeing to the above stipulated facts in support of his guilty plea.

Dated: 11/3/2022

Juan D. Berrio
Juan D. Berrio
Attorney for Defendant